

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 9:22-cv-81815-JIC

HOWARD MICHAEL CAPLAN,

Plaintiff,

vs.

J & E CAR CARE INC., a Florida Profit
Corporation d/b/a MEINEKE SHOP 2714
and 319 E. BOYNTON LLC, a Florida
Limited Liability Company,

Defendants.

_____ /

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

Plaintiff, HOWARD MICHAEL CAPLAN, and Defendants, J & E CAR CARE INC. d/b/a MEINEKE SHOP 2714 and 319 E. BOYNTON LLC (hereafter, “the Parties”), by and through their undersigned attorneys, and pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, hereby jointly stipulate to a dismissal of this action with prejudice. All Parties shall bear their own attorneys’ fees, costs and expenses other than those specified in a Confidential Settlement Agreement, and other than enforcement of said settlement agreement, agree not to file any additional motions in this matter. The Court retains jurisdiction to enforce the terms of the Parties’ Confidential Settlement Agreement. The Parties request that the Court to retain jurisdiction to enforce the terms of the Parties’ Confidential Settlement Agreement. All Parties consent to the form and content of this Stipulation and attached Order.

Respectfully submitted,

By: Ronald E. Stern

Ronald E. Stern, Esq.

Florida Bar No. 10089

Ronnette Gleizer, Esq.

Florida Bar No. 87417

THE ADVOCACY LAW FIRM, P.A.

1835 E Hallandale Beach Blvd., # 757

Hallandale, Florida 33009

Telephone: (954) 639-7016

Facsimile: (954) 639-7198

Email: ronsternlaw@gmail.com, advocacylawfirmmpa@gmail.com

Attorneys for Plaintiff, HOWARD MICHAEL CAPLAN

Michael L. Elkins

Michael L. Elkins, Esq.

Florida Bar No. 523781

MLE LAW

1212 Northeast 16th Terrace

Fort Lauderdale, FL 33304

Tel: (954) 401-2608

Email: melkins@mlelawfirm.com

Attorney for Defendant, J & E CAR CARE INC.

Joshua M. Entin

Joshua M. Entin, Esq.

Fla. Bar No. 493724

ENTIN LAW GROUP, P.A.

1213 S.E. Third Avenue

Ft. Lauderdale, Florida 33316

Tel: (954) 761-7201

Email: josh@entinlaw.com

Attorney for Defendant, 319 E. BOYNTON LLC

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 9:22-cv-81815-JIC

HOWARD MICHAEL CAPLAN,

Plaintiff,

vs.

J & E CAR CARE INC., a Florida Profit
Corporation d/b/a MEINEKE SHOP 2714
and 319 E. BOYNTON LLC, a Florida
Limited Liability Company

Defendant(s).

/

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 06, 2023, I electronically filed the foregoing with the Clerk of Court using CM/ECF. I also certify that the aforementioned documents are being served on all counsel of record, corporations, or pro se parties via transmission of Notices of Electronic Filing generated by CM/ECF.

By: Ronald E. Stern

Ronald E. Stern, Esq.

Florida Bar No. 10089

Ronnette Gleizer, Esq.

Florida Bar No. 87417

THE ADVOCACY LAW FIRM, P.A.

1835 E Hallandale Beach Blvd., # 757

Hallandale, Florida 33009

Telephone: (954) 639-7016

Facsimile: (954) 639-7198

Email: ronsternlaw@gmail.com, advocacylawfirmmpa@gmail.com

Attorneys for Plaintiff